



RAINONE  
COUGHLIN  
MINCHELLO  
ATTORNEYS AT LAW

Louis N. Rainone  
Craig J. Coughlin\*  
David L. Minchello  
Ronald H. Gordon  
Carol A. Berlen  
John F. Gillick  
Brian P. Trelease\*  
Claudia Marchese  
Matthew R. Tavares\*  
Sapana Shah\*Δ  
Michael R. Burns ✦  
Christopher D. Zingaro  
John P. Harrington

Edward Ruane  
Thomas Schoendorf  
Nahimot A. Adedimeji\*  
Corissa L. Sherman  
Frank J. Dyevoich\*  
Lonnie J. Hinton, Jr.,  
Harlynn A. Lack\*  
Aaron L. Rainone

\* Also admitted in New York  
Δ Also admitted in DC  
✦ Also admitted in Pennsylvania

Eruane@NJRCMLAW.com

May 22, 2023

Hon. J. Brendan Day  
Union States Magistrate Judge  
Clarkson S. Fisher Federal Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: Dion Harrell v. State of New Jersey, et al**  
**Docket No. 18-CV-11299**

Dear Judge Day:

This office represents the City of Long Branch and Brian O’Gibney in the above-entitled matter. In response to your Order of May 5<sup>th</sup>, it is the position of these defendants that the current operative complaint is the Amended Complaint filed by Plaintiff on October 20, 2020 (ECF No. 49). These defendants filed an Answer to the Amended Complaint on November 5, 2020 (ECF No. 49).

Furthermore, these defendants continue to oppose Plaintiff’s motion to file a second amended complaint for the reasons expressed in our opposition filed on March 20, 2023 (ECF No. 93).

284720v1

555 U.S. Highway One South  
Suite 440  
Iselin, New Jersey 08830

Tel: (732)709-4182  
Fax: (732) 791-1555  
[www.njrcmlaw.com](http://www.njrcmlaw.com)

RAINONE COUGHLIN MINCHELLO

May 22, 2023

Page 2

If there are any additional questions or requests, please advise. Thank you.

Respectfully submitted,

**RAINONE COUGHLIN MINCHELLO, LLC**  
Attorneys for the City of Long Branch and Brian  
O’Gibney



By: \_\_\_\_\_  
Edward P. Ruane, Esq.

ER/